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September 28, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Wireless E911 Location Accuracy Requirements*, WT Docket No. 07-114

Dear Ms. Dortch:

Verizon looks forward to reviewing the comments of public safety and industry stakeholders in this initial step toward establishing a feasible and reasonable Z-axis metric for delivering useful indoor location information to PSAPs.[1] Dispatchable location (DL) is the Commission's preferred indoor and vertical location solution, and to that end Verizon remains committed to using DL as its principal method of delivering vertical location information to PSAPs regardless of the backstop Z-axis metric the Commission ultimately adopts. Since 2015 the industry has diligently worked to develop the National Emergency Address Database (NEAD) to support DL. The NEAD, which will go live in 2019, is designed to provide more accurate and actionable location information by providing a street address, as well as floor, suite, room, and other information that will help to identify the location of a 911 caller. The wireless industry has already spent tens of millions of dollars on the NEAD initiative, and more than six million reference points (e.g., WiFi access points) have already been registered in the NEAD.

Verizon also understands the importance of a Z-axis metric that will be both feasible and meaningful to public safety. The Test Bed process was an important step—only an initial step, though—toward establishing a Z-axis metric as an important backstop to DL. In the weeks since the Test Bed results were submitted to the Commission, the industry has engaged in informative discussions with public safety on their concerns for the ±5 meters/80 percent metric supported by the testing. While Commission rules required that the industry submit a metric for consideration based on the Test Bed by August 3, 2018, Verizon believes it is premature to adopt ±5 meters as the Z-axis standard at this time. Rather, it would be better to step up efforts to advance location solutions that pave a path to the ultimate goal of "floor level" accuracy. That includes efforts to advance the implementation of the NEAD and to conduct further testing on alternative Z-axis

[1] *See* Public Notice, *Public Safety and Homeland Security Bureau Seeks Comment on Vertical (Z-Axis) Accuracy Metric Proposed by the Nationwide Wireless Carriers*, PS Docket No. 07-114, DA 18-928 (Sept. 10, 2018).

solutions that would improve on Z-axis accuracy. Verizon believes the wireless industry is committed to taking those steps, and is hopeful that the vendors who did participate in the Test Bed will do so again more comprehensively, and that additional vendors will participate as well.

This letter is submitted in accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact me if there are questions concerning this filing.

Sincerely,